STATE OF COLORADO

Bill Ritter, Jr., Governor
DEPARTMENT OF NATURAL RESOURCES
DIVISION OF WILDLIFE
AN EQUAL OPPORTUNITY EMPLOYER

Thomas E. Remington, Director
6060 Broadway
Denver, Colorado 80216
Telephone: (303) 297-1192
wildlife.state.co.us

For Wildlife-
For People

Date: August 12, 2008

Nicole Korbe
Senior Environmental Planner
1100 W. 116th Ave.
Westminster, CO 80234
P.O. Box 33695
Denver, CO 80233

RE: Tri- State 230-kilovolt Transmission Line Project Proposal (Walsenburg to San Luis Valley Sub-station)

Dear Ms. Korbe,

On behalf of the Colorado Division of Wildlife (CDOW), I would like to thank you for the opportunity to comment on the preliminary stages of the Tri-State Transmission Line Project. CDOW appreciates being involved in the preliminary stages of development, and asks to be involved throughout the process in order to provide the best outcome for wildlife resources within the project area.

Corridor identification is probably the most important factor for CDOW. The best corridor is the one that causes the least amount of disturbance to wildlife resources and allows you to meet your goals as well. I will address big game species such as deer, elk and pronghorn first, and then move on to avian concerns, which will be the most significant for this project, and finish with aquatic species issues.

Big Game Concerns
From Walsenburg to La Veta Pass, our preference is for corridor segments C, E, G, and H because they have the fewest additional impacts. This alternative utilizes an existing right-of-way where a big transmission line already exists for a major portion of the proposed route. The Tri-State map shows the corridor going through an avoidance area (elk calving area), but we believe those impacts would be partly mitigated by the overall reduced impacts of using this existing right-of-way. This proposed route has minimal new right-of-way disturbance. The other alternatives (O, N, M, & P) all have significant additional impacts with many more miles of new right-of-way disturbance.

From La Veta Pass to Alamosa, corridor segments Q and P both travel through elk and deer winter ranges and elk winter concentration areas. CDOW recommends that corridor segment Q be considered the preferred route since there is already an existing disturbance, Highway 160, located in that corridor. Although there would be disturbance to elk, deer and antelope winter ranges and elk severe winter range, corridor segments R, T, and U are recommended because it would not be as critical as usage of corridor segment S. We highly recommend corridor segment S not be considered. Many elk, deer, and a few antelope utilize this corridor heavily during winter months, making it a very important winter concentration area. If the transmission line cannot be located in the corridor segments adjacent to Highway 160, CDOW recommends that construction and maintenance be conducted after April 15th and prior to December 1st to minimize disturbance to wintering deer, elk, and pronghorn.

Avian/ Transmission line collision
Avian/ transmission line collisions are one of the main concerns along corridor segments T, U, V, W, X, Y, Z, and other corridor segments proposed leading up to the sub-station. There are numerous migratory birds that use what is considered a triangle of very important wetlands, grain fields and roosting areas to the north, south and east of the proposed corridors. Blanca Wetlands (BLM), San Luis Lakes State Park, and Head Lake (Wildlife Area) lay to the north of the proposed corridor segments T, U, V, W and X. The Alamosa Wildlife Refuge and Smith Reservoir (State Wildlife Area) are located to the

B-011-001: Comment Noted (In Review)

Your email/letter/comment form has been received and your comment noted.

The Environmental Impact Statement is anticipated to be completed in late 2010 and will be available at http://www.usda.gov/rus/water/ees/ea.htm.

south of corridor segments T, U, V, W, X, and Z. During the spring and fall of every year, thousands of Sandhill Cranes will use these areas for feeding and roosting. Pelicans will also migrate between San Luis Lakes, Alamosa Wildlife Refuge, and Smith Reservoir. Corridor segments EE, FF, and HH should be avoided because of waterfowl and crane activity in the area. Corridor segments AA and EE are near roosting sites located along the Rio Grande. Corridor segments FF and HH are located near agricultural fields that are used as feeding areas by cranes and waterfowl. CDOW recommends that Tri-State consider using corridor segments T, U, W, Z, AA, DD, GG, II and JJ. Although these corridors can still be detrimental to raptors, feeding waterfowl and cranes, we consider corridor segments V, X, Y, CC, BB, EE, FF, and HH to impact avian species at a greater level.

To avoid Avian/ Transmission Line Collisions, we recommend marking all lines, especially the top wire, throughout the entire project to make the line as visible as possible. Wind and fog can be severe in the corridors mentioned so it is critical to have lines as visible as possible. More emphasis on visibility of lines should be considered in corridor segments T, U, W, Z, AA, DD, GG, II, and JJ. CDOW recommends that Tri-State install Yellow Swan Flight Diverters on overhead static wires. This procedure has been used on transmission lines throughout the San Luis Valley and has had successful results for avoiding collisions. It is possible to stagger Swan Flight Diverters to minimize the number of devices required and cost. CDOW also recommends making the project as raptor safe as possible. There are many raptors that utilize these same locations. Raptors will use the newly installed line for perching and building nests. Transmission lines pose both an electrocution and collision hazard for raptors. CDOW suggests that Tri-state consult with EDM International, Inc. and the Avian Powerline interaction committee (APLIC) to consider designs that minimize the risk of raptor electrocutions and collisions.

Aquatic Concerns

CDOW's primary concern regarding aquatic species is to protect riparian habitat along all streams, reduce erosion and sedimentation by minimizing stream crossings, and protect Rio Grande cutthroat waters. The Rio Grande Cutthroat trout is a candidate species under the Endangered Species Act, and a Colorado species of special concern.

Wagon Creek, which is located along corridor segment P, has a core conservation population of Rio Grande Cutthroat. Also, Sangre De Cristo Creek, located along corridor segments Q and R, has a core conservation population of Rio Grande Cutthroat. Corridor segment S, which would cross the Blanca Trinchera Ranch, would impact Ute Creek. Ute Creek is good habitat for a Rio Grande cutthroat trout population. Cottonwood Creek along the same corridor is a potential Rio Grande Sucker reintroduction site for the endangered species. Recommendations for this corridor would be to minimize disturbance to riparian habitat and sedimentation from stream crossings at Ute Creek and Cottonwood Creek. The CDOW recommends removal of corridor S from the host of alternatives.

In all Corridors, CDOW recommends riparian habitat protection to minimize sedimentation and erosion by providing a minimum of a 50 foot no disturbance buffer zone on each side of the stream, and avoiding surface disturbance within 300 feet of the riparian zone to the maximum extent practical. CDOW also advises using existing road crossings and existing stream crossings for vehicles and other construction equipment instead of building new roads and stream crossings that will increase sedimentation and erosion.

Again, I thank you for the opportunity to comment on the preliminary stages of the Tri-State project. I look forward to commenting on specifics when the project is brought before the counties which will be impacted. I would like to conclude by recommending (from Walsenburg to the San Luis Valley Substation) corridor segments C, E, G, H, Q, R, T, U, W, Z, AA, DD, GG, II and JJ. All corridors proposed will impact the wildlife resource in one way or another but the corridor segments mentioned above will help to mitigate Avian/Transmission line Collision, the biggest concern to the wildlife resource.

If you have any questions regarding these comments, please contact my office.

Sincerely,

For Thomas Spezze,
Southwest Region Manager
Colorado Division of Wildlife